

Gordon T. Carey, Jr., OSB No. 771331
Nicholas J. Neidzowski, OSB No. 172584
Douglas R. Williams, *Pro Hac Vice*
Anderson Carey Williams & Neidzowski
6215 NE 31ST Avenue
Portland, OR 97211
Tel: (503) 222-1415
Fax: (503) 222-1923
gordon@gordoncarey.com
nick@boatlaw.com
doug@boatlaw.com

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JOHN GEE, an individual,

Plaintiff,

v.

GRACE OCEAN PRIVATE, LTD, a
foreign corporation, and **BRIGHT STAR**
SHIPMANAGEMENT, a foreign
corporation, and **M/V ALAM SETIA**, an
ocean-going cargo vessel.

Defendants.

Case No.: 3:19-cv-01224-YY

**JOINT RULE 26
DISCOVERY REPORT**

Pursuant to Federal Rule of Civil Procedure 26, the parties, by and through the undersigned counsel, conferred to discuss a discovery plan on October 14, 2019. This is

a maritime personal injury case that does not present complex issues of jurisdiction or choice of law. The parties hereby submit the following plan:

1. The parties have elected to waive initial disclosures.
2. Defendants will file and serve their corporate disclosure statement on November 8, 2019.
3. The parties propose the deadline of December 27, 2019, for joining additional parties.
4. Fact discovery can be completed by April 10, 2020. The parties will exchange expert disclosures and reports by May 8, 2020. Expert depositions will be completed by June 5, 2020. The parties request that the foregoing deadlines be set accordingly.
5. There are currently no issues regarding discovery, disclosure, or preservation of electronically stored information.
6. There are currently no issues concerning claims of privilege or work product.
7. The parties seek no orders at this time under Rule 16 or Rule 26.
8. The parties do not agree to a magistrate.
9. The pretrial order requirements should be dispensed with at this time.

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DATED this 14th day of October, 2019.

ANDERSON CAREY WILLIAMS & NEIDZWSKI

/s/ Douglas R. Williams

Douglas R. Williams, *Pro Hac Vice*

Nicholas Neidzowski, OSB No. 172584

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6215 NE 31st Avenue

Portland, OR 97211

Telephone: 503-222-1415

Telefax: 503-222-1923

Email: doug@boatlaw.com

nick@boatlaw.com

gordon@gordoncarey.com

Attorneys for Plaintiff

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SCHWABE, WILLIAMSON & WYATT

/s/ David R. Boyajian

David R. Boyajian, OSB #112852

1211 SW 5th Avenue, Suite 1900

Portland, OR 97204

Phone: (503) 222-9981

Fax: (503) 796-2900

Email: DBoyajian@schwabe.com

Attorneys for Defendants